

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
NML CAPITAL, LTD., 03 Civ. 8845 (TPG)
Plaintiff, 05 Civ. 2434 (TPG)
06 Civ. 6466 (TPG)
07 Civ. 1910 (TPG)
v. 07 Civ. 2690 (TPG)
07 Civ. 6563 (TPG)
THE REPUBLIC OF ARGENTINA, 08 Civ. 2541 (TPG)
Defendant. 08 Civ. 3302 (TPG)
08 Civ. 6978 (TPG)
09 Civ. 1707 (TPG)
09 Civ. 1708 (TPG)
-----x

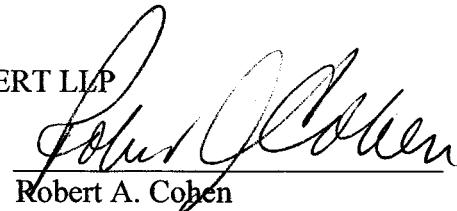
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying declaration of Joshua I. Sherman, dated October 29, 2010, and the exhibits thereto, the accompanying memorandum of law, and upon all the pleadings and proceedings had herein, Plaintiff NML Capital, Ltd. will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at such time as the Court shall direct, for an order, pursuant to Rule 37 of the Federal Rules of Civil Procedure, compelling non-party Banco de la Nación Argentina (“BNA”) to produce to Plaintiff the documents requested in the subpoena Plaintiff served upon BNA, and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
November 1, 2010

DECHERT LLP

By:



Robert A. Cohen

Charles I. Poret

Joshua I. Sherman

(robert.cohen@dechert.com)

(nml@dechert.com)

1095 Avenue of the Americas

New York, New York 10036

Tel. (212) 698-3500

Attorneys for Plaintiff NML Capital, Ltd.